

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

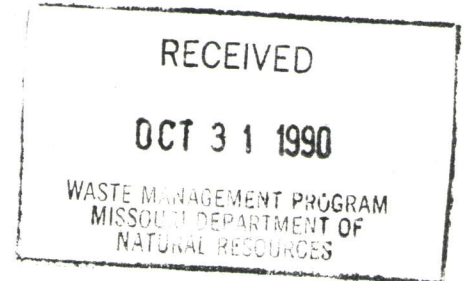
Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

October 23, 1990

Mr. Charlie Wekenborg
Production Manager
105 Byassee Drive
Continental Manufacturing Company
Hazelwood, MO 63042



Dear Mr. Wekenborg:

On October 18, 1990, a Resource Conservation and Recovery and Missouri Hazardous Waste Management Compliance Evaluation was conducted at your facility. The inspection was conducted by Mr. Bob Carlson, Environmental Specialist, Missouri Department of Natural Resources, (MDNR), St. Louis Regional Office (SLRO). A report on the inspection is attached.

The inspection was conducted under authority of the Resource Conservation and Recovery Act of 1976 and Section 260.377 and 260.375(9) of the Missouri Hazardous Waste Management Law 1977. The purpose of the inspection was to evaluate the facility for the applicability of the above referenced rules and regulations. After a file review and site tour, the inspector determined your facility is exempt from the regulations, as your waste stream was misclassified and is actually non-hazardous.

No violations were observed during the inspection and no response is required you at this time.

Should you have any questions, or wish to confer in this matter, please call Mr. Bob Carlson at (314) 849-1313.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Mike Struckhoff for
Robert S. P. Eck
Regional Administrator

RSPE/BC/mc

444597



RCRA RECORDS

WMP



RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

Continental Manufacturing Company
105 Byassee Drive
Hazelwood, MO 63042
(314) 731-0302

EPA ID: MOD095497137
Mo. Generator ID: 04953

Participants

Department of Natural Resources
(MDNR)

Mr. Bob Carlson
Environmental Specialist
St. Louis Regional Office

Continental Manufacturing
(Contico)

Mr. Charlie Wekenborg
Production Manager

Mr. Bob Weyermann
Plating Supervisor

Introduction

On October 18, 1990, an inspection of the above-referenced facility was conducted to assess compliance with regulations pursuant to the Resource Conservation and Recovery Act (RCRA) and the Missouri Hazardous Waste Management Law. The inspection covered waste management practices, and was conducted under the authority granted by Sections 260.375 (9) and 260.377 RSMo.

Facility Description

Contico is an electroplater of janitorial products, mainly mop wringers. The process is zinc plating on carbon steel, and since no cyanides are used or present in the waste, it is exempt from the F006 classification by definition. The waste was registered in 1985 by a previous facility representative.

The waste has been going to Peoria Disposal's Hazardous Waste Landfill; however, Mr. Wekenborg stated that he has been in contact with Mr. Kurt Hilsenbeck of the Waste Management Program about cancelling the facility's generator status, and having the dewatered sludge hauled as a special waste to BFI's sanitary landfill in Maryland Heights.

A recent TCLP analysis was examined. The waste meets all standards for metals, and cyanides were below the detection limit of 0.29 mg/kg. The waste is therefore non-hazardous.

No other hazardous wastes are generated at the facility.

27.080 General
Continental Manufacturing Co.
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Recommendation

Continue the process to be removed from the generator list and reclassify the sludge as a special waste.

Prepared By:



Bob Carlson
Environmental Specialist II

BC:mc

LARGE QUANTITY GENERATOR CHECKLIST

Form LQG-INSP
(10-15-88)Name of Facility: Continental Manufacturing Co. Date: 10-18-90Address: 105 Byassee Dr.
Hazelwood, MO 63042Other Inspections Done:
RR ☐ TRANS ☐ LDR ☒
OTHER ☐Phone: (314) 731-0302 MO ID# 04953 EPA ID# MO D095497137Facility Representative: Charlie Wekenberg Title: Production Mgr.

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

janitorial supplies (mop wringers, etc.) are electroplated.
Process is exempt: zinc plating on carbon steel. TCLP
results show no regulated metal levels. Facility
is attempting to have its registered status canceled, and
will apply for a special waste approval to take to Mo. Pass LF.

List of wastes generated. (Use continuation sheet, if needed.)

Waste	Amount/Month	Disposition
1. <u>"Foob" plating sludge</u>	<u>≈ 10 yd³</u>	<u>LF - Peoria Disposal</u>
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____
5. _____	_____	_____

A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)

Generator's MO and EPA I.D. Numbers. ☒
Manifest document number (MO I.D. & Shipment #). ☒
EPA Waste I.D. codes ☒
Generator's name, address, phone # ☒
All Transporters' names, phone #'s, MO and EPA I.D. #'s. ☒
Designated facility name, address, phone # and MO and EPA I.D. # ☒
Proper DOT Shipping Name, Hazard Class and I.D. # ☒
Containers, Quantity and Unit Wt/Vol being shipped properly designated ☒
Proper certification including waste minimization. ☒
Manifest properly signed and dated ☒
No more than 10 days time between generator and facility signatures. ☒
Manifests returned within 35 days. ☒
If not, exception generator report submitted within 45 days. ☒
Completed manifests and Summary Manifest Report and Certification. ☒
Spills of reportable quantities reported to DNR. ☒

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)1

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. ☒
Placards available for use by transporters ☒
Satellite accumulation requirements met (if applicable). ☒ N/A
a. Stored in satellite areas less than 1 year. ☒
b. Containers marked identifying contents and beginning date ☒
c. Containers kept closed/compatible/good condition. ☒
d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely
hz. waste). ☒

C. STORAGE STANDARDS 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Facility inspected and maintained. ☒
Date of accumulation marked. ☒
Storage less than 90 days (unless small quantity generator). ☒

D. CONTAINER STORAGE 10 CSR 25-5.262(2) AND 5.262(2)(C)2

Containers in good condition ☒
Containers kept closed in storage. ☒
Containers storing incompatible waste separated or protected from each other. ☒
Containers of ignitable or reactive waste stored > 50 feet from property line ☒
Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.B. ☒

N/A

E. STORAGE TANKS 10 CSR 25-5.262(2) AND 5.262(2)(C)2.C.
(See tank checklist)

N/A

F. PERSONNEL TRAINING 10 CSR 25-5.262(2)

Documentation of hazardous waste director's qualifications or training. (✓)
Completed classroom or on-the-job training. (✓)
Job title, description, and name of person filling position (✓)
Written record of the type and amount of training given (✓)
Documentation confirming that training has been given (✓)

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(2) AND 5.262(2)(C)2.E.

Internal communication or alarm system. (✓)
Device in the hazardous waste operation area capable of summoning emergency assistance. (✓)
Fire control, spill control, and decontamination equipment available. (✓)
Adequate water supply for fire control equipment. (✓)
Adequate and proper safety equipment available. (✓)
Adequate aisle space. (✓)
Arrangements with local emergency agencies. (✓)

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)

Contingency Plan. (✓)
Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste. (✓)
Describe formal arrangements with emergency agencies. (✓)
Name, addresses, and phone numbers (home & office) of emergency coordinators. (✓)
Emergency equipment including its description and location. (✓)
Evacuation plan if applicable (✓)

I. WASTE OIL 10 CSR 25-11.010

N/A

Written waste oil contract maintained ()
Waste oil properly stored and transported ()

J. LAND-BAN 40CFR 268

Notifications sent (✓)
Copies retained (✓)

COMMENTS: waste is not a regulated hazardous
waste and may be handled as a special waste.
Facility registered by mistake and is not
subject to regulations. Below TC standards for metals,
below EPA concern levels for cyanides (see 50FR 229).

Inspector Signature & Title: Not L L, EST
Office: SLRO

IN COMPLIANCE (✓)
IN VIOLATION OR
ABSENT ()

